



MARINE MAMMAL COMMISSION

2 December 2021

Ms. Martha Williams, Esq.
Principal Deputy Director
U.S. Fish and Wildlife Service
1849 C Street Northwest
Washington, DC 20240

Dear Ms. Williams:

The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, is writing to express concern regarding the unusual mortality event (UME) involving the Florida manatee. The Commission recently attended the Working Group on Marine Mammal Unusual Mortality Events (WGMMUME) Annual Meeting and the Biannual Manatee Forum where the manatee UME was discussed. In the past few months, numerous Congressional offices, from both the Senate and House of Representatives, also have contacted the Commission to express their concern about the manatee UME. Elevated strandings of manatees began along the east coast of Florida in December 2020. By 21 November 2021, 752 carcasses had been observed and 80 live animals had been rescued. The main cause of death has been starvation due to seagrass loss, primarily in the Indian River Lagoon. Although seagrass and overall habitat restoration are the long-term remedies, immediate, short-term solutions are needed. Ideally, those solutions would be either implemented or initiated before manatee strandings are expected to increase again this month.

The Commission understands that space to house and rehabilitate manatees currently is limited. Those space constraints likely will require that difficult decisions be made regarding euthanasia. The U.S. Fish and Wildlife Service (FWS) must shore up additional facilities or any contingency sites needed to temporarily house rescued manatees until they are able to be released back into the wild. This includes adding capacity at existing facilities, ensuring facilities that are adequate but do not currently have authorization to hold and rehabilitate manatees are provided the necessary authorization(s) in a timely manner, and allowing manatees to be held in other types of habitats (i.e., Welaka National Fish Hatchery and Homosassa Springs) on an emergency basis or as contingency sites. All such measures would minimize the need to euthanize manatees based on space constraints. Therefore, the Commission recommends that FWS take immediate action to increase capacity at approved rehabilitation facilities, provide facilities that usually do not house manatees with the necessary authorizations to do so, and approve appropriate contingency sites for the temporary holding of manatees.

In addition, the Commission understands that FWS, Florida Fish and Wildlife Conservation Commission (FFWCC), and other partners have been investigating the feasibility of conducting a supplemental feeding program, including through the use of expert elicitation. Setting up such a program—even as a pilot project—requires time to find, secure, and transport the necessary food supplies and to resolve any logistical issues. As such, the Commission recommends that FWS work

Ms. Martha Williams, Esq.
2 December 2021
Page 2

expeditiously to incorporate the findings of the supplemental feeding expert elicitation into any resulting decision and/or draft pilot project.

Responding to manatee strandings requires close collaboration of partners and the requisite funding. The Commission commends FWS's Jacksonville Field Office, FFWCC, the numerous response and rehabilitation facilities, industry partners (namely Florida Power & Light (FPL)), and non-governmental organizations (NGOs) for their continued efforts to conserve manatees, especially in response to this UME. The Commission also understands that, even if seagrass can be restored to a sustainable level, that could take up to a decade. Thus, manatees along the Atlantic coast will face poor nutrition for many years to come. In order to respond to near- and long-term elevated manatee strandings, the Commission recommends that FWS continue to work closely with FFWCC, the numerous response and rehabilitation facilities, FPL, and NGOs to (1) preserve its partnerships and (2) obtain the funding necessary to increase facility capacity and to respond to and rehabilitate live-stranded manatees, which at the most basic level includes securing sufficient food supplies.

The Commission emphasizes the importance of FWS acting in a timely manner and stands ready to assist in any way possible. Please contact me if you have any questions.

Sincerely,



Peter O. Thomas, Ph.D.,
Executive Director

cc: Bryan Arroyo, Deputy Director of Operations, U.S. Fish and Wildlife Service
Gary Frazer, Assistant Director for Endangered Species, U.S. Fish and Wildlife Service
Kimberly Tripp, Chief, Branch of Coastal and Marine Resources, U.S. Fish and Wildlife Service
Eric Sutton, Executive Director, Florida Fish and Wildlife Conservation Commission